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1 Han  
2 upcoming year, correct?  
3 A. Uh-huh.  
4 Q. Is that correct?  
5 A. Yes.  
6 Q. 2008, upcoming year.  
7 A. Yes.  
8 Q. And when we look at 2007, these are  
9 specific costs relating to your print media  
10 advertising.  
11 A. Right.  
12 Q. Now, are these costs included within  
13 the figures we looked at earlier?  
14 A. Yes.  
15 Q. From -- C.C. Stephens?  
16 A. C.C. Stephens, yes.  
17 Q. Just to be clear, the 292,000 summary  
18 for 2007 would include the numbers I see here on  
19 this sheet for 2007.  
20 A. Yes.  
21 Q. Okay. Thank you.  
22 MR. SCHROEDER: Let me mark the next  
23 document as Defendant's Exhibit 16.  
24 (Artisan's internal accounting  
25 document reflecting the expenses of the  
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1 Han  
2 VNU, business media, that's all the \$500.  
3 Q. What page are you on?  
4 A. Page --  
5 MR. MALTBIE: 230.  
6 A. 12 out of 17.  
7 Q. Okay. 230. VNU business media, okay.  
8 A. They are print magazines.  
9 Q. Print magazines?  
10 A. Yes. They are pay on top of -- it's  
11 not included in the C.C. Stephens.  
12 Q. Okay. What exactly is a print  
13 magazine?  
14 A. Basically, we hire C.C. Stephens, I  
15 think it's a later -- the year, and some of the  
16 media plan has already done, so we still go  
17 through our own channel to place advertisements,  
18 that kind of thing.  
19 So when you see VNU business media, it  
20 means we are paying the media directly. And  
21 when you see C.C. Stephens, in a later years, so  
22 we paying all the advertising and placement  
23 through C.C. Stephens. We are not paying  
24 anybody -- most company, we don't pay directly  
25 to them.  
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1 Han  
2 company was marked Defendant's 16 for  
3 identification, as of this date.)  
4 Q. Mr. Han, you have before you what's  
5 been marked as Defendant's 16. Do you recognize  
6 this document?  
7 A. Yes.  
8 Q. Can you explain to me what it is.  
9 Generally.  
10 A. Well, that's my accounting stuff.  
11 General entries, stuff like that.  
12 Q. This is a document created internally  
13 within Artisan reflecting the expenses of the  
14 company?  
15 A. That is correct.  
16 Q. Are these all the expenses incurred by  
17 Artisan to this period of time, to the best of  
18 your knowledge?  
19 A. That is correct.  
20 Q. Okay. So these expenses include such  
21 expenses as charges by C.C. Stephens, travel  
22 charges --  
23 A. And more than that, because we have  
24 like a VNU business media is --  
25 Sorry. We have -- when we look at  
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1 Han  
2 Q. Okay. Can you tell by looking at this  
3 what the charge was for?  
4 Yes, there's a charge for VNU business  
5 media for \$500.  
6 Is there a way to tell what that \$500  
7 was spent for?  
8 A. Print advertising.  
9 Q. Print advertising.  
10 A. Yeah.  
11 Q. Okay. Do you know what magazine or --  
12 A. VNU produced Kitchen and Bath Business  
13 Magazine.  
14 Q. Where is that magazine distributed, if  
15 you know?  
16 A. All the showrooms.  
17 Q. Would that be a magazine that would be  
18 given to a consumer free?  
19 A. Of -- if they go to the showroom, yes,  
20 maybe. But usually it's for trade eyes only.  
21 Q. How about the company, BNT Media?  
22 A. It's the same thing. It's another  
23 media company. Yeah.  
24 Q. Could you take a look at Bates Number  
25 231, page 13 of 17.  
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1 Han  
2 I see some charges for the trade show  
3 in Vegas, Kitchen and Bath Industry Show.  
4 A. 17 of 17?  
5 Q. 13 of 17.  
6 A. Okay. Sorry.  
7 Okay.  
8 Q. Okay. I see some charges for the  
9 Kitchen and Bath Industry Show.  
10 A. Yeah.  
11 Q. 10,900. Is that a charge for actually  
12 having a booth at the show?  
13 A. That is correct.  
14 Q. And the second charge --  
15 A. That is just part of the cost, because  
16 it's way more than 10,000.  
17 Q. Okay.  
18 A. It's usually split in half or  
19 something, to pay the -- place a deposit and  
20 then pay for the rest.  
21 Q. Uh-huh. What about the following  
22 charge, Field services for 17,000? What does  
23 that mean, if you know?  
24 A. Field services, Kitchen and Bath Show,  
25 basically that includes -- what date is that?

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1 Han  
2 second.  
3 (Discussion off the record.)  
4 (Luncheon recess at 2:06.)  
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1 Han  
2 2006. Okay. That's more like a --  
3 you know, a -- assembling of booth for you,  
4 dismantle the booth for you. So they caught a  
5 few services. It means they have to send out  
6 people to your booth and taking care of hanging  
7 signs, all that kind of stuff. They call field  
8 services.  
9 Q. And then there's another charge for  
10 16,150. Is that just an additional --  
11 A. Yeah.  
12 Q. That is an additional charge breaking  
13 up the total fee of the show costs?  
14 A. Yes.  
15 Q. Okay.  
16 Below that, what is spiffs?  
17 A. Spiffs is basically when you give  
18 customer -- like say you go to a showroom and  
19 talk to their salesperson and ask them to  
20 promote their sinks. In industry, you will say,  
21 You know what? If you sell one of our sinks, we  
22 can give you \$10, \$5. It's called spiff.  
23 It's -- a motivations, incentive, stuff.  
24 Q. Uh-huh. Okay. Thank you.  
25 MR. SCHROEDER: Off the record for a

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1 Han  
2 AFTERNOON SESSION  
3 (2:49)  
4 JIAN XIONG HAN  
5 resumed, having been previously duly  
6 sworn by a Notary Public, was  
7 examined and testified further  
8 as follows:  
9 CONTINUED EXAMINATION BY MR. SCHROEDER:  
10 Q. Before we took our break, we were  
11 talking about some of the advertising expenses  
12 that have been expended by Artisan. And just  
13 continuing on that theme, I was provided with a  
14 collection of documents showing various fliers,  
15 brochures, and that sort of thing.  
16 And you just have to bear with me a  
17 little bit because some of this stuff wasn't  
18 stapled together, so I'm not sure that I know  
19 that I have a complete package.  
20 A. Okay.  
21 Q. But -- I only have one copy, so if you  
22 can look on, too, with --  
23 MR. MALTBIE: That's fine.  
24 MR. SCHROEDER: Let's go ahead and  
25 mark this first flier, brochure, as

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1 Han

2 Defendant's Exhibit 17. And that is  
3 actually Bates Number 43.

4 (Advertising for magazines,  
5 Bates-stamped 43, was marked Defendant's 17  
6 for identification, as of this date.)

7 **Q. Mr. Han, just as a representative, a**  
8 **brochure, Defendant's Exhibit 17 -- well, let me**  
9 **ask you, what is Defendant's 17?**

10 A. It's advertising in place on the  
11 magazines. We place on the magazines, place  
12 with media.

13 **Q. And if I direct your attention to the**  
14 **typing above the photo, K and B, is that Kitchen**  
15 **and Bath Ideas? Is that what that represents,**  
16 **K and B Ideas?**

17 A. Yes.

18 **Q. Okay. Now, the date that appears to**  
19 **the right of that, 10/26/07, what is that date?**

20 A. October -- this is a confirmation that  
21 we having October 26, '07, for the next Kitchen  
22 and Bath Ideas Magazine.

23 **Q. So the ad would run following that**  
24 **date; is that what that means?**

25 A. No. It is just that this is the date  
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1 Han

2 that they produce, send us to confirm. This is  
3 the -- going to be placed to the next issue of  
4 magazine, of K and B Ideas, at --

5 **Q. Okay. So the ad would run on a date**  
6 **after October 26, 2007?**

7 A. Yeah. We have to submit the ad to the  
8 magazine, you know, so -- before that, our media  
9 company will confirm with us, this is the ad you  
10 want to use for that magazine.

11 **Q. Okay. Thank you.**

12 **So, is it safe to say that when a date**  
13 **like that appears on one of these sheets, that**  
14 **date either references a date the ad ran, or a**  
15 **date in advance of the ad running?**

16 A. The date in advance.

17 Usually they require a few months  
18 of -- of time to -- before you actually showing  
19 up in the magazine shelf.

20 **Q. Okay. Thank you.**

21 MR. SCHROEDER: Let me mark this next  
22 document as Defendant's Exhibit 18.

23 (CD dated April 30, 2007, with Artisan  
24 product logos, spec sheets, was marked  
25 Defendant's 18 for identification, as of  
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1 Han

2 this date.)

3 **Q. Can you tell me what appears in this**  
4 **document.**

5 A. It's a CD that produce for -- for us,  
6 or by us, with our product logos, spec sheets.

7 **Q. Okay. And there's a date, April 30,**  
8 **2007. You see that on the top?**

9 A. Yes.

10 **Q. What would that date signify?**

11 A. The date we produced.

12 **Q. Okay. Were there earlier versions of**  
13 **this CD?**

14 A. No. I don't think. We didn't started  
15 to use CD as our catalog until probably this  
16 last year.

17 **Q. Are these CDs distributed to your**  
18 **various dealers?**

19 A. Yes.

20 **Q. How do they use these CDs?**

21 A. CDs, if they don't have a catalog or  
22 they just want to show to the customer on the  
23 computer, brochure or stuff like that, they use  
24 the CD.

25 **Q. Okay. Thank you.**

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1 Han

2 MR. SCHROEDER: Mark the next document  
3 as Defendant's Exhibit 19.

4 And John, that's Bates Number 52.  
5 (Artisan thank you note, Bates-stamped  
6 52, was marked Defendant's 19 for  
7 identification, as of this date.)

8 **Q. What is that document, or what do I**  
9 **see in this document?**

10 A. "Thank you for selecting Artisan."  
11 Basically a thank you note either placed inside  
12 of the sinks when we sell it, or in brochure or  
13 something.

14 **Q. Okay.**

15 A. Just as a thank you note.

16 **Q. Okay. So would these appear inside of**  
17 **a sink that is packaged in a box?**

18 A. Could be. In a certain period of  
19 time, yes.

20 **Q. Do you currently put these thank you**  
21 **notes inside your sink boxes?**

22 A. I'm not sure.

23 **Q. Okay.**

24 MR. SCHROEDER: Go ahead and mark this  
25 as Defendant's Exhibit 20. And that's

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1 Han  
2 Bates Number 94.  
3 (Artisan brochure, Bates-stamped 94,  
4 was marked Defendant's 20 for  
5 identification, as of this date.)  
6 **Q. Mr. Han, the document before you, can**  
7 **you tell me what this is?**  
8 A. It's our brochure.  
9 **Q. Okay. Do you know from looking at it**  
10 **what the date on this brochure is?**  
11 A. I don't.  
12 **Q. If you look in the upper right-hand**  
13 **corner, does that signify a date, 19.3-2000?**  
14 A. No. This is the ASME standard.  
15 **Q. Okay.**  
16 MR. SCHROEDER: Mark the next two  
17 documents as Defendant's 21 and 22. And  
18 their Bates numbers are 97 and 98.  
19 (Shipping label, Bates-stamped 97, was  
20 marked Defendant's 21 for identification,  
21 as of this date.)  
22 (Document Bates-stamped 98 was marked  
23 Defendant's 22 for identification, as of  
24 this date.)  
25 **Q. Mr. Han, these two sheets in front of**  
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1 Han  
2 sink, to cut out the countertop.  
3 And by having them, and there's a  
4 digital template of our sinks, and they can drop  
5 right into the cutout. So basically the -- when  
6 you cut out the whole countertop, the machine  
7 will automatically cut out the sink, where does  
8 it need to be, and they do a very good, precise  
9 measurement of the cutouts.  
10 **Q. Is the cutout size the same for every**  
11 **sink?**  
12 A. Basically you -- the -- each sink has  
13 a different -- same model should have the same  
14 template.  
15 **Q. Okay. Thank you.**  
16 MR. SCHROEDER: And mark the next  
17 document as Defendant's 23. And that's  
18 Bates 101.  
19 (Document Bates-stamped 101 was marked  
20 Defendant's 23 for identification, as of  
21 this date.)  
22 **Q. Mr. Han, can you tell me when this**  
23 **document was created, if you know?**  
24 A. I don't know when it is exactly  
25 produced. I don't know.  
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1 Han  
2 **you, can you tell me what they are?**  
3 A. This is a label, a shipping label.  
4 **Q. You're referring to Defendant's**  
5 **Exhibit 21?**  
6 A. Yes.  
7 **Q. Okay.**  
8 A. And that's a shipping label, which put  
9 it outside of the box, to identify the sink.  
10 We put it.  
11 **Q. Okay.**  
12 **And Defendant's 22?**  
13 A. Basically, we ask ETemplate, a  
14 well-known company that -- in the industry to  
15 produce templates, stuff like that, to help us  
16 to produce a -- a digital template for CNC  
17 machines to cut out the sink hole. So they  
18 produce a -- a -- exact measurement of our sink  
19 cutout.  
20 **Q. Now, when would you use such a system**  
21 **like that?**  
22 A. Oh, basically, probably All Granite or  
23 any other, you know, companies that use a CNC  
24 machines, and basically they will cut out -- use  
25 a measurement, digital template, to cut out the  
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1 Han  
2 **Q. It has your Newark, New Jersey,**  
3 **address, so would it have to have been after you**  
4 **moved to New Jersey in 2007?**  
5 A. Right, yes.  
6 **Q. Okay. Okay. Thank you.**  
7 MR. SCHROEDER: The next document will  
8 be marked as Defendant's 24. And I believe  
9 it comprises these two pages, which I don't  
10 have stapled together. Maybe I can clip  
11 them together.  
12 (Advertisement and feature article  
13 were marked Defendant's 24 for  
14 identification, as of this date.)  
15 **Q. Let me first ask, is that correct in**  
16 **that these two pages belong together?**  
17 A. This is the ad itself. And then with  
18 the trends stuff as the feature. So it's a  
19 reproduction of the ad, and this is the feature  
20 article.  
21 **Q. Okay. Do you know when this ad**  
22 **originally ran?**  
23 A. I don't remember. It says 16 gauge.  
24 **Q. Again, if you look at the ad, on the**  
25 **second page there's a New Jersey phone number.**  
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1 Han

2 **Would that be an indication? Would it have run**  
3 **after you moved to New Jersey?**4 A. This ad has been produced, reproduced  
5 again, because this indicates a 16 gauge, and I  
6 think the first one we run on trend is 2006,  
7 with a different version of it.8 But this particular one, yes, it's  
9 running 2007.10 **Q. Okay. Thank you.**11 MR. SCHROEDER: Going to mark the next  
12 document -- I'll have to use my original  
13 copy, I see the date was cut off of the  
14 other copy -- as Defendant's 25. And it's  
15 Bates Number 186.16 (Advertisement Bates-stamped 186 was  
17 marked Defendant's 25 for identification,  
18 as of this date.)19 **Q. Mr. Han, we've marked what's depicted**  
20 **as Bates Number 186 as Defendant's 25.**21 Now, from my review of all these  
22 advertisements, this document appears to have  
23 the earliest date.

24 If you look on the --

25 A. Uh-huh.

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1 Han

2 **Q. -- right-hand column, on the bottom it**  
3 **says June 2006.**

4 A. Right.

5 **Q. Okay. Do you have any material dated**  
6 **earlier than June of which depicts either the**  
7 **Artisan mark or the fleur-de-lis logo?**

8 A. I don't know.

9 **Q. Okay. Thank you.**10 MR. SCHROEDER: I would like to mark  
11 this next document as Defendant's 26.12 (Mr. Han's yearly sales document was  
13 marked Defendant's 26 for identification,  
14 as of this date.)15 **Q. Mr. Han, do you recognize Defendant's**  
16 **Exhibit 26?**

17 A. Yup.

18 **Q. Can you tell me what that document is.**

19 A. That's my yearly sales.

20 **Q. Now, let me just refer you back to**  
21 **Defendant's Exhibit 12, which was your**  
22 **declaration. And in particular, let me refer**  
23 **you to paragraph 10 of your declaration.**24 **Okay. On the top of page 5, it**  
25 **states, "Since 2003, sales of Artisan brand sink**

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1 Han

2 **and related accessories have generated over**  
3 **20 million in sales."**

4 A. Okay.

5 **Q. Okay. Now I want to refer you back to**  
6 **Defendant's 26. I see a total for your 2007 of**  
7 **19 million.**8 **Are there additional sales which don't**  
9 **appear on this summary sheet?**

10 A. No.

11 **Q. So the number, through -- let me**  
12 **phrase that.**13 **Did you include any sales in 2008, in**  
14 **the 20 million figure that is set forth in**  
15 **paragraph 10 of your declaration?**

16 A. Could be. I don't know.

17 **Q. Okay. Who was your biggest customer**  
18 **today?**19 **Let's be more specific. Who is your**  
20 **biggest customer in 2007, if you know?**21 MR. MALTBIE: Mark this as attorneys  
22 eyes only, please.

23 A. Moore Supply.

24 **Q. Moore Supply?**

25 A. Yeah.

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1 Han

2 **Q. Where are they located?**

3 A. Texas.

4 **Q. What kind of company are they?**

5 A. Plumbing Wholesale.

6 **Q. Do they carry other brands of sinks**  
7 **besides Artisan, if you know?**8 A. They -- they carry -- yes. They  
9 carry, but I don't think they're actively  
10 promoting.11 **Q. Is Moore Supply -- are they**  
12 **significantly bigger in terms of sales than**  
13 **other customers of yours?**14 A. Yes, they are, in the distributor  
15 level. Not necessarily bigger than other  
16 distributors, but they are -- in the distributor  
17 level, they're bigger than other customers,  
18 smaller customers.19 **Q. Can you explain that? I didn't follow**  
20 **that explanation.**21 A. They are -- there's many levels of  
22 customers.23 **Q. Okay.**24 A. There's retail customers, there's  
25 wholesale customers, and there's distributor

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1 Han  
2 customers, and the distributor customers are  
3 substantially, usually larger than the retail  
4 customers.  
5 **Q. Does that mean, then, that Moore**  
6 **Suppliers distributes and in turn sells other**  
7 **sinks to other retailers?**  
8 A. That is correct.  
9 **Q. Are they dealing with the purchasing**  
10 **public at that level?**  
11 A. Yes. They also deal with the  
12 purchasing public. They have showrooms, stuff  
13 like that.  
14 **Q. Have they been your biggest seller for**  
15 **more than the last year?**  
16 A. No. There's others that are similar  
17 size.  
18 **Q. Okay.**  
19 A. Sales.  
20 **Q. Okay. Let's go back to 2003, when you**  
21 **first started.**  
22 A. Uh-huh.  
23 **Q. If you recall, who was your largest**  
24 **customer back at that point, in 2003, when you**  
25 **started?**

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1 Han  
2 A. We have companies that sell on the Web  
3 sites.  
4 **Q. Okay. Would a customer see the name**  
5 **or logo upon entering a store?**  
6 A. Yes. We have customers displaying our  
7 displays, which is have our logos right on top.  
8 **Q. The customers -- rephrase that.**  
9 **The retailers who sell your sinks, who**  
10 **are countertop installers, granite installers of**  
11 **that sort, do they display the Artisan name and**  
12 **the logo along with the sink?**  
13 A. Say that again? I'm sorry.  
14 MR. SCHROEDER: Read back that  
15 question.  
16 (The record was read back.)  
17 MR. MALTBIIE: Objection to form.  
18 **Q. Do you understand the question?**  
19 A. I don't know, because I don't go to --  
20 very often to customer's showroom.  
21 **Q. Okay. That would be a better question**  
22 **to ask Joe?**  
23 A. That is correct.  
24 **Q. Do you know how many of your retailers**  
25 **sell your sink to the consuming public versus**

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1 Han  
2 A. I don't know. I have to look into the  
3 books.  
4 **Q. Okay. Has your customer base changed**  
5 **much over the years?**  
6 A. Yes.  
7 **Q. It has.**  
8 A. Yeah.  
9 **Q. In terms of increasing, or in terms of**  
10 **changeover?**  
11 A. Everything.  
12 **Q. The way you market sinks, when does a**  
13 **customer see the Artisan word or the**  
14 **fleur-de-lis logo? When is he exposed to that?**  
15 MR. MALTBIIE: Objection to form.  
16 A. I don't know -- could be anything.  
17 I can't specifically tell.  
18 **Q. Would you see it on a Web site?**  
19 A. We advertising -- we do have a Web  
20 site.  
21 **Q. Okay. How about a company which sells**  
22 **your products on Web sites? Would they see**  
23 **the --**  
24 A. Of course.  
25 **Q. -- the logo would --**

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1 Han  
2 **give it away as a -- as a freebie?**  
3 MR. MALTBIIE: Objection, form.  
4 A. I don't think anybody give away  
5 freebies. I mean, they just build the profit  
6 into the sink and -- into the job, whatever they  
7 do.  
8 **Q. Okay. Let me rephrase that question.**  
9 **Do you know what percentage of your**  
10 **customers charge, specifically charge, for the**  
11 **sale of the Artisan sink?**  
12 A. Our sales training has emphasized how  
13 to sell, not on how they give it away.  
14 **Q. Okay.**  
15 **Would Joe have a better idea of which**  
16 **customers are selling and which customers are**  
17 **giving away?**  
18 A. He will.  
19 **Q. Okay.**  
20 THE WITNESS: Excuse me.  
21 **Q. Take a break?**  
22 A. No, no, that's okay.  
23 **Q. Okay. Referring back to your**  
24 **declaration to paragraph 5, you referred to two**  
25 **Web sites, IraWoods.com and USKitchenware.com.**

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1 Han  
2 A. Right.  
3 Q. Are those two major retailers of your  
4 Artisan sinks?  
5 A. Yes.  
6 Q. Do they sell a significant part of  
7 your sinks?  
8 A. Yes.  
9 Q. Would they be in your top ten  
10 retailers in terms of the amount of sales?  
11 A. They're more like the online  
12 retailers, basically. They're just selling over  
13 the Internet.  
14 Q. Okay.  
15 A. They also sell in the showroom, but  
16 the significant part of it is over the Internet.  
17 Q. Do you have an idea where they fit in  
18 the scheme of percentage sales? Are they top  
19 10 percent, top 20 percent?  
20 A. Top -- definitely top 20, and -- but  
21 on top of that, I don't know.  
22 Q. Okay.  
23 Are there other Internet -- start all  
24 over. Are there other Internet resellers -- one  
25 more time.

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1 Han  
2 Are there other Internet sellers of  
3 Artisan sinks besides Ira Woods and U.S.  
4 Kitchenware?  
5 A. I'm sure there will be on the  
6 Internet, but I'm not sure --  
7 Q. At this time, are they the two  
8 significant, major sellers of your product on  
9 the Internet, to the best of your knowledge?  
10 A. Those two are has been the two biggest  
11 one that we have.  
12 Q. Okay. When a company like Ira Woods  
13 advertises Artisan sinks on their Web site, who  
14 provides the artwork or photographs to the  
15 company to show your products?  
16 A. We authorized they can use our  
17 photograph in the literature.  
18 Q. Okay. So you generally provide the  
19 photograph to them depicting your sink.  
20 A. Yes.  
21 Q. So when I log onto the Web site and I  
22 view the Artisan sink, the photo I'm viewing  
23 originated with Artisan.  
24 A. That's correct. But however, it could  
25 be some dealers, they take their own pictures.

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1 Han  
2 That could be also --  
3 Q. Okay.  
4 A. -- possible.  
5 MR. SCHROEDER: Mark the next document  
6 as Defendant's 27.  
7 (Printout of the home page of  
8 IraWoods.com was marked Defendant's 27 for  
9 identification, as of this date.)  
10 Q. Mr. Han, Defendant's 27, as you'll  
11 note, is a printout of the home page of  
12 IraWoods.com. Are you familiar with this at  
13 all?  
14 A. No.  
15 Q. Do you recognize it as being a home  
16 page or Web page of IraWoods.com?  
17 A. From -- yeah. From the printout, yes.  
18 Q. Okay. Now, let me ask you one  
19 question. If you look at the left-hand column,  
20 do you see the list of items that are listed  
21 there?

22 A. Right.  
23 Q. And there's a section entitled  
24 "Kitchen."  
25 A. Okay.

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1 Han  
2 Q. And under the word "Kitchen" is  
3 kitchen faucets, kitchen sinks, garbage  
4 disposers.  
5 A. Yes.  
6 Q. To you, what does that mean?  
7 A. That's categories that they sell.  
8 Categories of products.  
9 Q. Okay. Fine.  
10 MR. SCHROEDER: Let's go ahead and  
11 mark this as Defendant's 28.  
12 ("Kitchen sinks" link of a Web site  
13 was marked Defendant's 28 for  
14 identification, as of this date.)  
15 MR. SCHROEDER: And this next document  
16 is Defendant's 29.  
17 ("Undermount sinks" link of a Web site  
18 was marked Defendant's 29 for  
19 identification, as of this date.)  
20 Q. Okay. And I'll represent to you that  
21 as you start clicking through the links on the  
22 left-hand column there, Defendant's 28 is a  
23 click on the kitchen sinks link, and Defendant's  
24 29 is a click on the undermount sinks link.  
25 A. Okay.

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1 Han  
2 Q. And at each of these points the Web  
3 page shows representative sinks. I'm not sure  
4 which sink they're showing in these photographs.  
5 Let's go ahead and mark the next  
6 document as Defendant's 30.  
7 (Web page concerning undermount  
8 double-bowled sinks was marked Defendant's  
9 30 for identification, as of this date.)  
10 Q. Mr. Han, Defendant's 30, we have now  
11 clicked down to undermount double-bowled sinks.  
12 And we start to see, depicted here, some of the  
13 Artisan sinks; is that correct?  
14 A. Right. That's correct.  
15 Q. Okay.  
16 Can you tell from looking at these  
17 photographs, are these photographs that were  
18 provided by Artisan, or were these photographs  
19 that were taken by Ira Woods?  
20 A. Provided by us.  
21 Q. Thank you.  
22 Looking at Defendant's 30, and the  
23 Artisan sinks depicted there on the first page.  
24 A. Okay.  
25 Q. Can you tell me if any of these sinks  
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1 Han  
2 Q. This is a click on the actual Artisan  
3 sink from the previous page, and we see a larger  
4 photograph of the Artisan sink.  
5 A. Uh-huh.  
6 Q. Can you tell from that photograph if  
7 there's a fleur-de-lis on that sink?  
8 A. Yes.  
9 Q. You can.  
10 A. Yeah.  
11 Q. You see a fleur-de-lis.  
12 A. There is an insignia.  
13 Q. And where do you see that insignia?  
14 A. Right here.  
15 Q. Can you describe where in the  
16 photograph you're pointing to.  
17 A. Over here.  
18 Q. You're pointing to the larger bowl of  
19 the two-bowl portion.  
20 A. Yeah.  
21 Q. And do you actually see insignia there  
22 or --  
23 A. There's insignia.  
24 Q. Where it has sort of an orange tint to  
25 it, is that the insignia portion you're talking  
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1 Han  
2 depict the fleur-de-lis logo?  
3 A. From this distance, no.  
4 Q. Okay. Thank you.  
5 MR. SCHROEDER: Let's go ahead and  
6 mark the next four documents as Defendant's  
7 31, 32, 33, and 34.  
8 (Picture of a sink was marked  
9 Defendant's 31 for identification, as of  
10 this date.)  
11 MR. SCHROEDER: 32.  
12 (Picture of a sink was marked  
13 Defendant's 32 for identification, as of  
14 this date.)  
15 MR. SCHROEDER: 33.  
16 (Picture of a sink was marked  
17 Defendant's 33 for identification, as of  
18 this date.)  
19 MR. SCHROEDER: And 34.  
20 (Picture of a sink was marked  
21 Defendant's 34 for identification, as of  
22 this date.)  
23 Q. Okay, let's turn our attention first  
24 to Defendant's 31.  
25 A. Okay.  
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1 Han  
2 about?  
3 MR. MALTBIIE: The black mark.  
4 A. There's a black mark.  
5 Q. Okay.  
6 Let's take a look at Defendant's  
7 Exhibit 32. I'll ask you the same question. Do  
8 you see the Artisan fleur-de-lis on the sink in  
9 Defendant's 32?  
10 A. This one, no.  
11 Q. Okay. Let's take a look at  
12 Defendant's 33. Do you see the Artisan --  
13 A. Hold on a second.  
14 Q. 33.  
15 A. You were looking at 32. I'm sorry, I  
16 wasn't looking at 32.  
17 Q. Should we go back to 32?  
18 A. Yeah.  
19 Q. Let's go back to 32. Do you see the  
20 Artisan fleur-de-lis on the sink in  
21 Defendant's 32?  
22 A. No.  
23 Q. Okay. Now let's turn to --  
24 A. For the printouts.  
25 Q. Now let's turn to Defendant's 33. Do  
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1 Han  
2 you see the Artisan fleur-de-lis on the sink  
3 shown in Defendant's 33?  
4 A. Based on the printout, no.  
5 Q. Okay. And I'll ask you the same  
6 question about Defendant's 34. Do you see a  
7 fleur-de-lis on that sink shown in 34?  
8 A. Based on this printout, no.  
9 Q. Are you surprised to see Artisan sinks  
10 appearing in Ira Woods without a fleur-de-lis  
11 logo on them?  
12 MR. MALTBIE: Objection to form.  
13 A. What did you mean?  
14 Q. Has the fleur-de-lis logo always been  
15 on the Artisan sink, to the best of your  
16 knowledge?  
17 A. Yes, it is.  
18 Q. And you testified earlier that you --  
19 you supplied these photographs to Ira Woods, for  
20 their Web site.  
21 A. That is correct.  
22 Q. Do you have any explanation, other  
23 than the quality of the photographs, as to why  
24 the fleur-de-lis would not be on those sinks?  
25 A. Based on how they -- how the picture  
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1 Han  
2 MR. SCHROEDER: Let's mark the next  
3 document as Defendant's 35.  
4 (Printout from Ira Woods website was  
5 marked Defendant's 35 for identification,  
6 as of this date.)  
7 Q. And this document is also a printout  
8 from Ira Woods, but now we're looking at the  
9 undermount single bowl sinks. And again, we see  
10 a plurality of Artisan sinks.  
11 A. Uh-huh.  
12 Q. And let me ask you, again, from  
13 looking at these photographs, do you see the  
14 Artisan fleur-de-lis on any of these sinks?  
15 A. You can't see any insignia in any  
16 other brands neither, so ... there's no brand --  
17 there's no way you can see any brands on the  
18 pictures, if you pay attention.  
19 Q. Thank you.  
20 MR. SCHROEDER: Let's go ahead and  
21 mark the next three documents as  
22 Defendant's 36, 37 and 38.  
23 (Photograph of Artisan undermount  
24 single-bowl 16-gauge sink was marked  
25 Defendant's 36 for identification, as of  
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1 Han  
2 were taken and how strong is the insignia, has  
3 been on the sink, the photo might not show it  
4 because of the reflection of the light.  
5 Q. But now these are the photographs  
6 taken by your advertising people?  
7 A. In order to show a logo strongly, you  
8 have to artificially put the logo into the  
9 computer when you're taking the picture, because  
10 the light does not reflect very well on  
11 stainless steel sinks because it's white.  
12 Basically it reflects light and -- if  
13 you put a pencil mark on the wall and try to  
14 take a picture, you're probably not going to get  
15 it, unless you just focus on that mark.  
16 Q. So if a customer were to purchase one  
17 of these sinks that we looked at, it's your  
18 testimony that the sink, when it arrives, would  
19 have a fleur-de-lis logo on it?  
20 A. That's correct.  
21 Q. And to the best of your recollection,  
22 there hasn't been any sinks produced without a  
23 fleur-de-lis logo on them?  
24 A. That I don't know.  
25 I can't answer that.  
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1 Han  
2 this date.)  
3 (Photograph of a sink was marked  
4 Defendant's 37 for identification, as of  
5 this date.)  
6 (Photograph of a sink was marked  
7 Defendant's 38 for identification, as of  
8 this date.)  
9 Q. Let me turn your attention to  
10 Defendant's 36, which represents an Artisan  
11 undermount single-bowl 16-gauge sink.  
12 A. Right.  
13 Q. And in that photograph, can you see  
14 the Artisan fleur-de-lis on the sink?  
15 A. I think it is over here.  
16 It's here right, a dot mark right  
17 here.  
18 Because this sink supposed to put it  
19 this way, and shot instead of -- in this way,  
20 because the -- the 12-by-14 is not that -- the  
21 same. You can put it, lay it out.  
22 Q. So your testimony is that the  
23 fleur-de-lis appears on --  
24 A. The left.  
25 Q. -- that end of the --  
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1 Han  
2 A. I think it is on the left there.  
3 Q. -- of the sink or on the left-hand  
4 side of the sink as shown in the photo there?  
5 A. There's a dark mark right here.  
6 Well, it's maybe a dark mark right  
7 here.  
8 Q. Okay. Thank you.  
9 Let's take a look at Defendant's 37.  
10 I'll ask you the same question.  
11 A. Where is Defendant's 37?  
12 Q. Do you see a fleur-de-lis on that  
13 sink?  
14 A. I -- again, the sink was laid  
15 differently. You cannot see any insignia on  
16 this side. It will be on this side.  
17 Q. It would be on the left-hand side of  
18 that sink?  
19 A. Yes.  
20 Q. Okay. Thank you.  
21 And let's take a look at the sink  
22 shown in Defendant's 38. Can you see a  
23 fleur-de-lis on that sink?  
24 A. Right here.  
25 Q. Where are you pointing to?

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1 Han  
2 So, at this time, if they go to Ira  
3 Woods and look at Artisan, they were not so  
4 concerned about the actual logo anymore on the  
5 picture.  
6 Q. Do you see the logo anywhere else in  
7 any of these pages? And feel free to look back  
8 on the Ira Woods pages that I've handed to you.  
9 A. Uh-huh.  
10 Q. Do you see the logo appearing anywhere  
11 else on these Web pages, other than possibly on  
12 the sink itself?  
13 A. I cannot tell you, because the  
14 picture's so small and --  
15 Q. No. Other than the photograph --  
16 A. If you give me a 20 inches TV monitor,  
17 and maybe I can identify it.  
18 Q. But other than the photograph or the  
19 sink, do you see the fleur-de-lis on any of the  
20 other printed sections of these pages?  
21 Feel free to look back through the  
22 pages I handed to you.  
23 A. Based on the very low pixel, small  
24 pictures that you presented, with no resolution  
25 whatsoever, it's -- I only can see couple, as I

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1 Han  
2 A. Over here.  
3 Q. Can you describe that.  
4 A. It's --  
5 Q. The section below the faucet?  
6 A. Yup. Right, just right there. If you  
7 blow it up, this picture is, give a little more  
8 pixels, yes, because the original pictures has  
9 the logo right there.  
10 Q. Now, let me ask you this question: A  
11 consumer logging onto Ira Woods and looking at  
12 this sink, would a consumer see a fleur-de-lis,  
13 realistically? Would a consumer know there's a  
14 fleur-de-lis in any of these sinks?  
15 MR. MALTBIIE: Objection to form.  
16 A. If --  
17 MR. MALTBIIE: Answer if you know.  
18 A. My answer is not yes or no. If a  
19 customer usually searched for sink, they would  
20 type in "Artisan," and they usually have seen  
21 our sinks in somewhere, either in showroom as  
22 presented by the salesperson or in the print  
23 media, has look at our sinks. You know, I want  
24 to do a little bit more research on it, and they  
25 have been exposed with the logo already.

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1 Han  
2 mentioned. And other than that, I cannot  
3 identify the logo due to the low resolution of  
4 the photo.  
5 Q. Okay. But other than the photographs,  
6 you don't see the fleur-de-lis on the Web page  
7 itself for X, the title of the sink. Does that  
8 contain the fleur-de-lis where it describes the  
9 sink as an Artisan 82321-DS-S?  
10 A. I believe there's no need to put logo  
11 in there, because American Standard never put  
12 their logo there. Blanco never put their logo  
13 there. So it's industry standard, on the Web  
14 site, you just put the name of the item that you  
15 are trying to sell and reduce the -- the pixel  
16 that you have to load up to the Web site.  
17 Q. Okay.  
18 A. If you put all the logos there, and  
19 this -- this page probably takes 20 minutes to  
20 load up.  
21 Q. Okay. Thank you.  
22 A. All right.  
23 MR. SCHROEDER: Let's mark the next  
24 document as Defendant's 39.  
25 (Printout from the Web site of

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1 Han  
2 USKitchenware.com was marked Defendant's 39  
3 for identification, as of this date.)  
4 MR. SCHROEDER: I'll represent this  
5 document is a printout from the Web site of  
6 USKitchenware.com.  
7 A. Okay.  
8 Q. Again, on the left-hand side, we see a  
9 column shows the selection of products --  
10 A. Right.  
11 Q. -- sold on this Web site, correct?  
12 A. Uh-huh.  
13 Q. One of those products being kitchen  
14 sinks.  
15 A. All right.  
16 Q. Okay.  
17 Now, when we click through, we get to  
18 a page depicting Artisan sinks, and or let's  
19 mark that document as Defendant's Exhibit 40.  
20 (Web page depicting Artisan sinks was  
21 marked Defendant's 40 for identification,  
22 as of this date.)  
23 Q. Mr. Han, I'll ask you to look at  
24 what's marked as Defendant's 40. And in  
25 particular, to look at the Artisan sinks, and to  
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1 Han  
2 Q. Defendant's 41 is two-page document,  
3 again from U.S. Kitchenware.  
4 A. Right.  
5 Q. It depicts an ENX undermount large  
6 single-bowl sink, and the second page it shows  
7 an enlarged photo of the sink.  
8 A. Uh-huh.  
9 Q. Now, when you look at this photo, do  
10 you see a logo on the sink shown in this photo?  
11 Let me ask you the question, if you  
12 look back, Exhibit 40, and also an ENX picture,  
13 and show it right here, did you see a logo right  
14 here?  
15 A. In the middle sink, you do not see a  
16 logo, no.  
17 You see the logo, though, in the sink  
18 on the left, which is the one --  
19 Depends on how they take the picture,  
20 and the lighting, all that kind of stuff, you  
21 may see or may not see.  
22 Q. Now, as you say, it depends on the  
23 lighting whether or not the logo is visible.  
24 Since these photographs were provided by  
25 Artisan, why wouldn't Artisan have taken more  
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1 Han  
2 tell me if you see the fleur-de-lis logo on any  
3 of those sinks.  
4 A. Yes. A 2120 D 9, you see a logo right  
5 there.  
6 Q. And where do you see the logo in that  
7 photograph?  
8 A. Right here.  
9 Q. Can you describe that for the --  
10 A. See right here.  
11 Q. Describe that for the court reporter  
12 where are you pointing.  
13 A. The center of the sink, on the --  
14 against the wall.  
15 Q. Toward the back section. Up near the  
16 top of the sink?  
17 A. Yeah.  
18 Q. Okay. And do you see the fleur-de-lis  
19 logo in any of the other sinks?  
20 A. Based on the picture, no.  
21 MR. SCHROEDER: Let's mark this next  
22 document as Defendant's 41.  
23 (Two-page printout from the Web site  
24 of USKitchenware.com was marked Defendant's  
25 41 for identification, as of this date.)  
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1 Han  
2 care to ensure that the fleur-de-lis was visible  
3 in the photographs?  
4 MR. MALTBIE: Objection to form.  
5 A. I don't know why. I'm not the one who  
6 can produce it, the pictures.  
7 Q. Okay. Thank you.  
8 We've spoken earlier about Artisan  
9 selling 16-gauge sinks. Now, it's my  
10 understanding Artisan also sells 18-gauge sinks;  
11 is that correct?  
12 A. That's correct.  
13 MR. SCHROEDER: And let's mark this  
14 next document as Defendant's 42.  
15 (Customer proposal prepared by Artisan  
16 Manufacturing was marked Defendant's 42 for  
17 identification, as of this date.)  
18 Q. Do you recognize this document,  
19 Mr. Han?  
20 A. No.  
21 Q. Is it a document originating with  
22 Artisan, to the best of your knowledge?  
23 A. Could be. Some draft.  
24 Q. Okay. The first sentence that  
25 describes Artisan Manufacturing as offering  
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1 **Han**  
2 **premium quality sinks in an 18-gauge**  
3 **thickness --**  
4 A. Excuse me, hold on a second. This  
5 piece of literature is for a specific customer  
6 as a proposal. Has not gone onto the market  
7 because the sink model, everything, doesn't  
8 match. It is just for a specific customer, and  
9 when we do a proposal for them, and we make this  
10 sheet.  
11 **Q. Okay.**  
12 A. So....  
13 **Q. Has this sink ever been sold?**  
14 A. No.  
15 **Q. Do you believe that you could make a**  
16 **quality sink in an 18-gauge thickness?**  
17 A. Depends on how you define quality.  
18 Some people think Toyota is quality, but some  
19 people think Mercedes is quality. So depends on  
20 what your interpretation of quality.  
21 **Q. Okay. How would you define quality in**  
22 **terms of an 18-gauge sink?**  
23 A. I would define it as acceptable.  
24 **Q. Okay. Any other characteristics that**  
25 **would --**

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1 **Han**  
2 **describes a professional kitchen collection as**  
3 **being crafted from durable Kohler cast iron and**  
4 **high-quality 18-gauge Kohler stainless steel.**  
5 In your opinion, does Kohler produce a  
6 quality 18-gauge sink?  
7 MR. MALTBIE: Objection to form.  
8 A. What do you mean by quality 18-gauge?  
9 I don't understand.  
10 **Q. Well, Kohler's advertisements describe**  
11 **their sink as a high-quality 18-gauge Kohler**  
12 **stainless steel.**  
13 A. Right.  
14 **Q. In your opinion, is a Kohler 18-gauge**  
15 **sink a quality sink?**  
16 MR. MALTBIE: Objection to form.  
17 A. If I never heard of a Mercedes-Benz,  
18 I'd probably think Honda is the best car in the  
19 world. So depends on what did you know and what  
20 you don't know.  
21 **Q. Do customers perceive Kohler as a**  
22 **quality sink?**  
23 MR. MALTBIE: Objection to form.  
24 A. They perceive Kohler as a quality  
25 brand.

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1 **Han**  
2 A. That's it.  
3 **Q. Okay.**  
4 MR. SCHROEDER: All right. Let's mark  
5 the next two documents as Defendant's 43  
6 and 44.  
7 (Paragraph in which Kohler describes a  
8 professional kitchen collection was marked  
9 Defendant's 43 for identification, as of  
10 this date.)  
11 (Document prepared by Kohler was  
12 marked Defendant's 44 for identification,  
13 as of this date.)  
14 **Q. Now, we spoke a little bit earlier**  
15 **about some other brand. We mentioned Kohler. I**  
16 **don't know if we mentioned Franke.**  
17 **You are familiar with the Kohler**  
18 **brand, I understand.**  
19 A. Yes.  
20 **Q. Are you familiar with Franke sinks as**  
21 **well?**  
22 A. Yes.  
23 **Q. Let's just take a look at**  
24 **Defendant's 43.**

25 **And in that first paragraph, Kohler**  
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1 **Han**  
2 **Q. Okay. Let me ask you to turn to the**  
3 **second -- strike that.**  
4 Let me ask you to refer to the second  
5 document we marked as Defendant's 44. You  
6 mentioned earlier you are familiar with the  
7 Franke brand sinks?  
8 A. Yeah.  
9 **Q. And Franke, according to this, is a**  
10 **Swiss manufacturer of sinks?**  
11 A. Sure.  
12 **Q. And you agree with that, they are**  
13 **Swiss manufacturers?**  
14 A. Yes.  
15 **Q. And if I ask you to turn to the second**  
16 **page of this document, Franke advertises that**  
17 **they also produce 18-gauge stainless sinks. And**  
18 **they talk about having the highest percentages**  
19 **of chromium and nickel, for deep, rich glow.**  
20 Do you agree with that assessment of  
21 their sinks, to the best of your knowledge?  
22 MR. MALTBIE: Objection.  
23 A. Assessment of what?  
24 **Q. That they have the highest percentage**  
25 **of chromium and nickel. If you know.**

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1 **Han**  
2 A. I don't know. I never tested.  
3 **Q. That's fine. Do you believe that**  
4 **customers perceive Franke sinks as high-quality**  
5 **sinks?**  
6 A. Again, probably through a  
7 salesperson's mouth, they perceive Franke as a  
8 quality brand.  
9 **Q. Okay. Thank you.**  
10 **Do you have any reason to believe that**  
11 **All Granite branded sinks are inferior to any of**  
12 **these sinks we discussed, whether it be the**  
13 **Kohler, the Franke, or the Artisan sink?**  
14 A. What did you mean?  
15 MR. SCHROEDER: Read back the  
16 question.  
17 (The record was read back.)  
18 A. I don't know that question. Probably  
19 ask Kohler, will be better.  
20 I don't know enough to....  
21 **Q. Okay. That's fine. Have you ever**  
22 **told anyone outside of your company that All**  
23 **Granite branded sinks are inferior to, for**  
24 **example, Artisan sink?**  
25 A. No.  
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1 **Han**  
2 MR. MALTBIE: Objection to form.  
3 A. I don't know.  
4 **Q. Are you aware of any uses of Artisan**  
5 **on similar products?**  
6 A. Not aware of.  
7 MR. SCHROEDER: Let's mark the next  
8 four documents as Defendant's 45, 46, 47,  
9 48.  
10 (Printout of a Web page from  
11 Universal.AKB was marked Defendant's 45 for  
12 identification, as of this date.)  
13 (Document which refers to an artisan  
14 drain basket was marked Defendant's 46 for  
15 identification, as of this date.)  
16 (Document referring to an artisan  
17 colander manufactured by Franke was marked  
18 Defendant's 47 for identification, as of  
19 this date.)  
20 (Document referencing an artisan white  
21 synthetic cutting board manufactured by  
22 Franke was marked Defendant's 48 for  
23 identification, as of this date.)  
24 **Q. Let me refer your attention to what we**  
25 **marked as Defendant's Exhibit 45, and I'll**  
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1 **Han**  
2 **Q. To the best of your knowledge, have**  
3 **your salespeople ever told anyone that All**  
4 **Granite brand sinks are inferior to Artisan**  
5 **sinks?**  
6 A. I don't know that. You have to ask  
7 them.  
8 **Q. Thank you.**  
9 **Let's take a look back at your**  
10 **declaration there on page 1. There's a caption,**  
11 **"Artisan and Its Valuable Trademarks."**  
12 **And if we turn to paragraph 7, we**  
13 **actually discuss which trademarks are included**  
14 **in the term "Artisan trademarks."**  
15 **You see that?**  
16 A. All right.  
17 **Q. Now, you mentioned earlier that you**  
18 **chose the name Artisan after visiting a**  
19 **restaurant, I believe you said in --**  
20 A. Artisinal.  
21 **Q. And the restaurant was located?**  
22 A. 33rd Street, Park Avenue.  
23 32nd Street, Park Avenue.  
24 **Q. Are you aware of any other uses of the**  
25 **name Artisan in the trade?**  
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1 **Han**  
2 **represent that is printout of a Web page from**  
3 **Universal.AKB, an appliance and kitchen center**  
4 **And I'll refer your attention to the**  
5 **upper portion of that page. It refers to a**  
6 **Franke Artisan inset sink. Do you see that?**  
7 A. Right.  
8 **Q. Have you ever seen that before?**  
9 A. No.  
10 **Q. You've never seen -- let me rephrase**  
11 **that.**  
12 **You've never been advised in the past**  
13 **that Franke sells an Artisan inset sink?**  
14 A. No.  
15 **Q. All right. Let me refer your**  
16 **attention to the next page of Defendant's 45,**  
17 **which is a detailed description of the Franke**  
18 **Artisan inset sink, ARX-630.**  
19 **Have you ever seen that description**  
20 **before?**  
21 A. ARX-630?  
22 **Q. Correct.**  
23 A. Okay. What about it?  
24 **Q. Have you ever seen that reference**  
25 **before, that sink before?**  
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1 Han  
 2 A. No.  
 3 Q. And likewise, on the following page,  
 4 the ARX 670, have you ever seen a reference to  
 5 that sink before?  
 6 A. No.  
 7 Q. So prior to today, you were unaware of  
 8 that Franke was selling an Artisan inset sink?  
 9 A. No.  
 10 Q. Let me rephrase that question.  
 11 Prior to today – prior to today, you  
 12 were unaware that Franke was selling an Artisan  
 13 inset sink, correct?  
 14 A. No.  
 15 Q. You were unaware, correct?  
 16 A. No. Not aware.  
 17 Q. Okay. Let's take a look at what we  
 18 marked as Defendant's 46, which refers to an  
 19 artisan drain basket.  
 20 Is that manufactured by your company?  
 21 A. No.  
 22 Q. It's manufactured by Franke, correct,  
 23 according to the –  
 24 A. That's correct.  
 25 Q. And likewise, on Defendant's 47, the  
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1 Han  
 2 registration are granite monuments, granite  
 3 tombstones, mausoleums, granite – granite grave  
 4 markers of granite.  
 5 Were you aware of this registration  
 6 prior to today?  
 7 A. No.  
 8 Q. Have you ever come across this mark in  
 9 the marketplace?  
 10 A. No.  
 11 Q. Thank you.  
 12 MR. SCHROEDER: Let's mark this next  
 13 document as Defendant's 50.  
 14 (Registration issued on December 7,  
 15 1999, for the mark, Artisan, was marked  
 16 Defendant's 50 for identification, as of  
 17 this date.)  
 18 Q. Again, what you have before you  
 19 Mr. Han is a registration issued on December 7,  
 20 1999, for the mark, Artisan, as used in  
 21 connection with cleaners for use on marble,  
 22 granite and other stone or tile products.  
 23 A. Okay.  
 24 Q. Have you ever come across this mark in  
 25 the marketplace?  
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1 Han  
 2 artisan colander, is it manufactured by Franke?  
 3 A. Yes.  
 4 Q. And Exhibit 48, the artisan white  
 5 synthetic cutting board, it's manufactured by  
 6 Franke, correct?  
 7 A. That's correct.  
 8 Q. Were you aware of any of these  
 9 products prior to today?  
 10 A. No.  
 11 Q. Thank you.  
 12 MR. SCHROEDER: Mark the next document  
 13 as Defendant's 49.  
 14 (Trademark registration of Artisan  
 15 issued to Buttura & Sons, Inc., was marked  
 16 Defendant's 49 for identification, as of  
 17 this date.)  
 18 Q. Mr. Han, what I'm showing to you is a  
 19 trademark registration issued to a company  
 20 called Buttura & Sons, Inc., located in Vermont.  
 21 A. Uh-huh.  
 22 Q. The mark that's been registered is  
 23 Artisan, with the design appearing next to it.  
 24 A. Okay.  
 25 Q. And the goods described in the  
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1 Han  
 2 A. No.  
 3 Q. Have you ever seen anyone using this  
 4 mark?  
 5 A. No.  
 6 Q. Prior to today, you were unaware of  
 7 this mark being used in the marketplace.  
 8 A. No.  
 9 Q. Thank you.  
 10 MR. SCHROEDER: Let's mark the next  
 11 two documents as Defendant's 51 and 52.  
 12 (Printout from the trademark database  
 13 showing a pending application for the mark,  
 14 Artisan, used in connection with ceiling  
 15 fans, applied for by Hunter Fan Company,  
 16 was marked Defendant's 51 for  
 17 identification, as of this date.)  
 18 (Notice of allowance for the  
 19 application for the Artisan mark was marked  
 20 Defendant's 52 for identification, as of  
 21 this date.)  
 22 Q. Mr. Han, Defendant's 51 is a printout  
 23 from the trademark database showing a pending  
 24 application for the mark, Artisan, used in  
 25 connection with ceiling fans, which has been  
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1 **Han**  
2 **applied for by Hunter Fan Company.**  
3 **A. Right.**  
4 **Q. Are you aware -- rephrase that. Were**  
5 **you aware of this application prior to today?**  
6 **A. No.**  
7 **Q. Now, Defendant's 52 is a notice of**  
8 **allowance for that same application. To the**  
9 **best of your knowledge, did Artisan**  
10 **Manufacturing Company take any action against**  
11 **this pending application?**  
12 **MR. MALTBIIE: Objection to form.**  
13 **Q. You can answer the question if you**  
14 **understand it.**  
15 **MR. MALTBIIE: It's a 1B application.**  
16 **There was a 1B application. I don't know**  
17 **there would be any opportunity for Artisan**  
18 **to take any action against this mark at**  
19 **this point.**  
20 **MR. SCHROEDER: Other than an**  
21 **opposition proceeding.**  
22 **MR. MALTBIIE: I don't think you can**  
23 **take an opposition proceeding against an**  
24 **ITU application.**  
25 **Q. In terms of your answer, was there any**  
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1 **Han**  
2 **MR. SCHROEDER: Go ahead and mark one**  
3 **more document here. Defendant's 54.**  
4 **(Registration from the United States**  
5 **Patent and Trademark Office for a service**  
6 **mark and trademark by Artisan Machine,**  
7 **Inc., for the word "Artisan" Was marked**  
8 **Defendant's 54 for identification, as of**  
9 **this date.)**  
10 **Q. Mr. Han, what's been marked as**  
11 **Defendant's 54 is another registration from the**  
12 **United States Patent and Trademark Office for a**  
13 **service mark and trademark for the word**  
14 **"Artisan." The owner of the mark is Artisan**  
15 **Machine, Inc. --**  
16 **A. Right.**  
17 **Q. -- in Indiana. And the mark is**  
18 **directed to grinding machines for rubber**  
19 **processing and recycling, machine parts, namely**  
20 **millstones, machine parts, namely bearing**  
21  **housings.**  
22 **A. Right.**  
23 **Q. Have you ever seen this mark before?**  
24 **A. No.**  
25 **Q. Have you ever encountered it in the**  
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1 **Han**  
2 **action taken by Artisan Manufacturing against**  
3 **this application, to date?**  
4 **A. I have -- not aware of that mark.**  
5 **Q. Fair enough.**  
6 **MR. SCHROEDER: Let's mark the next**  
7 **two-page document as Defendant's 53.**  
8 **(Two-page Web page printout regarding**  
9 **a company called Artisan Manufacturing**  
10 **located in Oakland, California, was marked**  
11 **Defendant's 53 for identification, as of**  
12 **this date.)**  
13 **Q. Mr. Han, Defendant's 53 is a Web page**  
14 **printout referring to a company called Artisan**  
15 **Manufacturing located in Oakland, California.**  
16 **And page 2 provides a description about the**  
17 **company.**  
18 **A. Okay.**  
19 **Q. Have you ever heard of this company**  
20 **before?**  
21 **A. No.**  
22 **Q. Have you ever encountered this company**  
23 **in the marketplace?**  
24 **A. No.**  
25 **Q. Okay. Thank you.**  
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1 **Han**  
2 **marketplace?**  
3 **A. No.**  
4 **Q. So prior to today, you were unaware**  
5 **this registration existed.**  
6 **A. No.**  
7 **Q. You were unaware prior to today that**  
8 **this registration existed.**  
9 **A. That is correct.**  
10 **Q. Thank you.**  
11 **MR. SCHROEDER: We can take a**  
12 **five-minute break. Stretch our legs.**  
13 **MR. MALTBIIE: Sure.**  
14 **(Recess from 3:58 to 4:04.)**  
15 **BY MR. SCHROEDER:**  
16 **Q. Let me refer you back to your**  
17 **declaration, Exhibit 12. Okay. And let me**  
18 **refer you to paragraph 7.**  
19 **Actually, paragraph 7 and 8.**  
20 **Okay. Which list the various**  
21 **trademarks/applications which are owned by**  
22 **Artisan.**  
23 **A. Right.**  
24 **Q. Okay. And just to make this easier,**  
25 **we'll mark one more document as Defendant's 55**  
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1 **Han**  
 2 **which is the application for the fleur-de-lis,**  
 3 **Application Number 77,316,683, for sinks.**  
 4 **(Application Number 77,316,683 for the**  
 5 **fleur-de-lis for sinks was marked**  
 6 **Defendant's 55 for identification, as of**  
 7 **this date.)**  
 8 **Q. Who authorized the filing of this**  
 9 **trademark application, if you know?**  
 10 **A. Me.**  
 11 **Q. Okay. And if I direct your attention**  
 12 **to the left-hand column, do you see where it**  
 13 **says "filing date"?**  
 14 **A. Uh-huh.**  
 15 **Q. And after that is October 30, 2007.**  
 16 **A. Right.**  
 17 **Q. That represents the date on which this**  
 18 **application was filed, correct?**  
 19 **A. Correct. File or -- I think it's just**  
 20 **a modification.**  
 21 **Q. Okay. Based on your testimony earlier**  
 22 **today and the allegations in the various papers,**  
 23 **and even as claimed here in this application,**  
 24 **it's Artisan's position that usage of this**  
 25 **fleur-de-lis goes back to 2003; is that correct?**  
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1 **Han**  
 2 **August 2003." So the application is filed in**  
 3 **2007, but you claim usage back to 2003.**  
 4 **A. Fleur-de-lis, we -- also has file. We**  
 5 **probably can ask the previous attorney to**  
 6 **provide the data, the letters that we go back**  
 7 **and forth, that we asked -- I asked them to file**  
 8 **both, probably. If they still keep the record.**  
 9 **Q. Who were your previous attorneys?**  
 10 **A. I can give you the name. I don't**  
 11 **remember.**  
 12 **Q. I may have asked you this. Who**  
 13 **authorized the filing of this trademark**  
 14 **application? Was that you?**  
 15 **A. Yes.**  
 16 **Q. Was that done in response to the**  
 17 **allegations made against All Granite?**  
 18 **MR. MALTBIE: Objection to form, and**  
 19 **only answer if it's unrelated to something**  
 20 **you discussed with counsel.**  
 21 **A. Again, the -- all the trademarks and**  
 22 **the word was filed by the time the -- when it**  
 23 **first use.**  
 24 **Q. Thank you.**  
 25 **MR. SCHROEDER: Let's mark this next**  
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1 **Han**  
 2 **A. Yes.**  
 3 **Q. Why did Artisan wait until 2007 to**  
 4 **file this trademark application?**  
 5 **MR. MALTBIE: Objection to form.**  
 6 **A. I think we -- in 2003, we filed a**  
 7 **trademark application already.**  
 8 **Q. For the mark, Artisan, correct?**  
 9 **A. Yes, everything, the word and then the**  
 10 **design.**  
 11 **Q. Let me refer you back to your**  
 12 **declaration, paragraph 7. The first list marked**  
 13 **there is Artisan.**  
 14 **A. Right.**  
 15 **Q. That is your originally filed**  
 16 **trademark.**  
 17 **A. Okay. Right.**  
 18 **Q. Now, that mark is only for the word**  
 19 **"Artisan."**  
 20 **A. Okay.**  
 21 **Q. Now, in 2007, this fleur-de-lis**  
 22 **application was filed.**  
 23 **A. The fleur-de-lis also filed the same**  
 24 **year, right. If you look down.**  
 25 **Q. What that says is, "First use,**  
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1 **Han**  
 2 **document as Defendant's 56.**  
 3 **(All Granite logo was marked**  
 4 **Defendant's 56 for identification, as of**  
 5 **this date.)**  
 6 **Q. Mr. Han, do you recognize the logo**  
 7 **that's shown in what's been marked as**  
 8 **Defendant's 56?**  
 9 **A. Yes.**  
 10 **Q. What logo is that?**  
 11 **A. That's All Granite's infringing logo.**  
 12 **Q. Now, you have also in front of you a**  
 13 **depiction of your fleur-de-lis shown there on**  
 14 **Defendant's 55.**  
 15 **A. Right.**  
 16 **Q. Do you believe the logo, the All**  
 17 **Granite logo shown in Defendant's 56, is similar**  
 18 **to the logo shown in Defendant's 55?**  
 19 **A. Yes.**  
 20 **Q. Can you point to any characteristics**  
 21 **which make the logo similar.**  
 22 **A. The flower over here. The -- the**  
 23 **pattern that goes. You know, it's the same.**  
 24 **Q. Any other --**  
 25 **A. The design -- the design elements of**  
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1 Han  
2 the whole thing is similar.  
3 **Q. Okay. Any particular characteristics?**  
4 MR. MALTBIE: Objection, form.  
5 A. I don't know.  
6 **Q. Okay.**  
7 **Do you recognize the logo which**  
8 **appears in Defendant's 56 as representing and/or**  
9 **depicting a crown?**  
10 A. To me, it is the -- they tried to  
11 produce a similar logo that when you not paying  
12 close attention, standing 5 feet, 10 feet above  
13 it, you wouldn't distinguish what it is.  
14 **Q. So back to my question. Do you see**  
15 **that logo as a crown?**  
16 A. Modified it for the fleur-de-lis logo.  
17 **Q. I'm sorry?**  
18 A. Modified fleur-de-lis logo.  
19 **Q. Modified fleur-de-lis logo.**  
20 A. Yeah.  
21 **Q. Do you know whether fleur-de-lis logos**  
22 **are common in the marketplace?**  
23 A. Say it again?  
24 MR. SCHROEDER: Read back my question,  
25 please.  
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1 Han  
2 you worked with.  
3 A. Right.  
4 **Q. Correct.**  
5 **If you compare the fleur-de-lis shown**  
6 **here on the first page of this Wikipedia article**  
7 **to the fleur-de-lis shown in your trademark**  
8 **application, do you believe this fleur-de-lis is**  
9 **similar to your fleur-de-lis?**  
10 A. How did you define similar? Means  
11 either different or same or --  
12 **Q. Do you believe they look the same?**  
13 A. They're not look the same.  
14 **Q. Do you believe a consumer would find**  
15 **these two logos to be similar?**  
16 MR. MALTBIE: Objection. Form.  
17 A. You can ask consumers. I can't answer  
18 for them. Different cultural backgrounds have  
19 different understanding.  
20 **Q. But in your mind, the logos look**  
21 **different.**  
22 MR. MALTBIE: Objection to form.  
23 A. In my mind. I don't know.  
24 **Q. Okay. Fair enough.**  
25 **Are you aware of any other companies**  
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1 Han  
2 (The record was read back.)  
3 MR. MALTBIE: Objection to form.  
4 A. I'm not a trademark scientist. I  
5 don't know.  
6 **Q. Thank you.**  
7 MR. SCHROEDER: Let's mark this next  
8 document as Defendant's 57.  
9 (Printout from Wikipedia for the term  
10 "fleur-de-lis" was marked Defendant's 57  
11 for identification, as of this date.)  
12 **Q. Are you familiar with Wikipedia, that**  
13 **appears on the Internet?**  
14 A. Yes.  
15 **Q. Okay. Defendant's 57 is a printout**  
16 **from Wikipedia for the term "fleur-de-lis."**  
17 **Are you familiar with the history of**  
18 **fleur-de-lises?**  
19 A. Not much.  
20 **Q. Who chose the fleur-de-lis design, if**  
21 **you know?**  
22 A. It was one of the suggestions of the  
23 designers.  
24 **Q. That's right. You mentioned earlier**  
25 **that it was a designer, a Chinese designer that**  
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1 Han  
2 **using a fleur-de-lis logo on similar products?**  
3 A. Similar products? No.  
4 MR. SCHROEDER: Let's mark this next  
5 document as Defendant's 58.  
6 (Fleur-de-lis design was marked  
7 Defendant's 58 for identification, as of  
8 this date.)  
9 **Q. Mr. Han, are you familiar with the**  
10 **company, Latoscana?**  
11 A. I heard of them, yes.  
12 **Q. And do you know that they market and**  
13 **sell faucets?**  
14 A. Yes.  
15 **Q. And if I refer you back to Defendant's**  
16 **27, which is the Ira Woods Web page, we saw that**  
17 **Ira Woods, for example, carries both faucets and**  
18 **sinks, correct?**  
19 A. Yes.  
20 MR. SCHROEDER: That was 27.  
21 **Q. Now, you see the emblem that appears**  
22 **above the word "Latoscana"?**  
23 A. Uh-huh.  
24 **Q. And you see the fleur-de-lis design**  
25 **that appears in that emblem?**  
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1 **Han**  
 2 A. Yes.  
 3 Q. Do you believe that fleur-de-lis  
 4 design is similar to your fleur-de-lis design  
 5 which appears in the application there as  
 6 Defendant's 55?  
 7 A. Okay. They have a horse in it.  
 8 Q. Okay. That is a difference. I agree.  
 9 Let's look at the fleur-de-lis  
 10 portion. Is the fleur-de-lis similar to the  
 11 fleur-de-lis in your application?  
 12 MR. MALTBIE: Objection, form.  
 13 A. You aware of the horse more than the  
 14 fleur-de-lis.  
 15 Q. Okay. Now, when you look at the  
 16 fleur-de-lis, though, is the fleur-de-lis  
 17 similar to your fleur-de-lis?  
 18 A. Some similarity.  
 19 Q. Do you notice any differences?  
 20 A. They got three -- three branches, and  
 21 there's one, two, three -- I got five. All  
 22 Granite's got five, too. One, two, three, four,  
 23 five.  
 24 Q. Okay. Any other differences between  
 25 the fleur-de-lis shown there on Defendant's 58  
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1 **Han**  
 2 appears over the letter I is similar to your  
 3 fleur-de-lis logo?  
 4 A. No.  
 5 Q. Can you describe the difference  
 6 between your two designs.  
 7 A. As said, it doesn't look like a  
 8 fleur-de-lis at all.  
 9 Q. Any particular differences you can  
 10 point to?  
 11 MR. MALTBIE: Objection to form. It's  
 12 also described as stylized splash design.  
 13 Q. Okay. Can you describe any  
 14 differences yourself, though, Mr. Han, between  
 15 the two?  
 16 A. There is no difference.  
 17 Q. I'm sorry?  
 18 A. There is no difference, I don't think  
 19 so, between these judgment and my judgment.  
 20 MR. MALTBIE: He means, can you -- is  
 21 there any -- can you describe the  
 22 difference between this and your design.  
 23 A. This and my design? This is a spring,  
 24 it's not a fleur-de-lis. It doesn't relate to  
 25 fleur-de-lis at all.  
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1 **Han**  
 2 and the fleur-de-lis shown on your application?  
 3 A. Other than that, no.  
 4 MR. SCHROEDER: Let's mark this next  
 5 document as Defendant's 59.  
 6 (Design and the word "Aquadis" was  
 7 marked Defendant's 59 for identification,  
 8 as of this date.)  
 9 Q. Mr. Han, are you familiar with the  
 10 company, Aquadis?  
 11 A. Yes.  
 12 Q. And do you know that they sell  
 13 faucets?  
 14 A. Yes.  
 15 Q. Okay. And if you look at the mark  
 16 which is registered, you see a flower design  
 17 appearing over the letter I in Aquadis.  
 18 MR. MALTBIE: Objection to form.  
 19 A. That's not a flower design.  
 20 Q. Okay. How would you describe that  
 21 design?  
 22 A. A spring.  
 23 Q. A spring?  
 24 A. A water spring. That's it.  
 25 Q. Okay. Do you feel that design which  
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1 **Han**  
 2 Q. Thank you.  
 3 Are you aware of any of the  
 4 manufacturers using crown logos in the  
 5 marketplace on similar-type products?  
 6 A. No.  
 7 MR. SCHROEDER: Let's mark this next  
 8 document as Defendant's 60.  
 9 (Logo for Whitehaus was marked  
 10 Defendant's 60 for identification, as of  
 11 this date.)  
 12 Q. Mr. Han, are you familiar with  
 13 Whitehaus?  
 14 A. Right.  
 15 Q. And they're a manufacturer of sinks,  
 16 correct?  
 17 A. Yes.  
 18 Q. Have you ever seen that logo?  
 19 A. Yes.  
 20 Q. The crown logo before? You have.  
 21 A. Yes.  
 22 Q. And do you believe that crown logo is  
 23 similar to your fleur-de-lis logo?  
 24 A. No.  
 25 Q. No?  
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1 Han  
2 A. It's not similar.  
3 Q. And can you describe for me the  
4 differences between that crown logo and the  
5 fleur-de-lis logo, if you can?  
6 MR. MALTBIE: Objection. Form.  
7 A. It doesn't look like a flower at all.  
8 Q. What does it look like?  
9 A. A crown.  
10 Q. Okay. Thank you.  
11 MR. SCHROEDER: Let's mark this next  
12 two-page document as Defendant's 61.  
13 (Trademark registration and logo for  
14 Kindred was marked Defendant's 61 for  
15 identification, as of this date.)  
16 Q. Mr. Han, are you familiar with the  
17 manufacturer, Kindred?  
18 A. Yes.  
19 Q. And they manufacture sinks, correct?  
20 A. Right.  
21 Q. Now, it's hard to see on this first  
22 page, which depict the trademark registration,  
23 but if you look on page 2, you see a logo next  
24 to the word "Kindred." Do you see that?  
25 A. Yes.  
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1 Han  
2 RoyalSink.com.  
3 Does this refresh your recollection at  
4 all? Do you -- are you familiar with the Royal  
5 USA brand?  
6 A. Say it again.  
7 Q. Have you ever seen that brand before?  
8 Are you familiar with this brand?  
9 A. I heard of it, but I'm not familiar  
10 with it.  
11 Q. Okay. Let's take a look at the logo  
12 that appears at the top of the Defendant's 63.  
13 A. Okay.  
14 Q. In your opinion, is that logo similar  
15 to your fleur-de-lis logo?  
16 A. No.  
17 Q. Can you describe for me the difference  
18 between that logo and your logo.  
19 A. Yeah. The crown got an R.  
20 Q. Any other differences?  
21 A. No.  
22 Q. Thank you.  
23 MR. SCHROEDER: Let's mark this  
24 document as Defendant's 64.  
25 (Trademark registration to the  
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1 Han  
2 Q. How would you describe that logo?  
3 A. It's a crown logo.  
4 Q. Okay. Is that logo similar to your  
5 fleur-de-lis logo?  
6 A. No.  
7 Q. Can you describe for me differences  
8 between that crown logo and your fleur-de-lis  
9 logo.  
10 MR. MALTBIE: Objection to form.  
11 A. One is a crown, one is flower.  
12 MR. SCHROEDER: Let's mark this next  
13 document as Defendant's 62.  
14 (Document pertaining to the company R  
15 Royal USA was marked Defendant's 62 for  
16 identification, as of this date.)  
17 Q. Mr. Han, are you familiar with the  
18 company, R Royal USA?  
19 A. No.  
20 MR. SCHROEDER: Please mark this next  
21 document as Defendant's 63.  
22 (Printout of Web page from  
23 RoyalSink.com was marked Defendant's 63 for  
24 identification, as of this date.)  
25 Q. Defendant's 63 is a Web page from  
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1 Han  
2 company, RAK Verticals, was marked  
3 Defendant's 64 for identification, as of  
4 this date.)  
5 Q. Mr. Han, Defendant's 64 is a trademark  
6 registration to the company, RAK Verticals.  
7 A. Uh-huh.  
8 Q. Have you ever heard of that company?  
9 A. No.  
10 Q. Have you ever seen that logo in the  
11 marketplace?  
12 A. No.  
13 Q. The logo is directed to plumbing --  
14 let me rephrase that.  
15 The trademark application is directed  
16 to plumbing fixtures, namely bathroom sinks,  
17 bathtubs, shower trays, et cetera.  
18 And in your opinion, is this logo  
19 similar to your fleur-de-lis logo?  
20 A. No.  
21 Q. Can you describe for me the  
22 differences between this logo and your  
23 fleur-de-lis logo.  
24 MR. MALTBIE: Objection to form.  
25 Q. If any.  
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1 **Han**  
2 A. It's a -- totally irrelevant. This is  
3 a crown logo.  
4 **Q. Okay. And versus your fleur-de-lis**  
5 **logo.**  
6 A. Right.  
7 **Q. Okay. Thank you.**  
8 MR. SCHROEDER: Let's mark this next  
9 document as Defendant's 65.  
10 (Trademark registration for RLI and  
11 design, for the company Top Care, Inc., was  
12 marked Defendant's 65 for identification,  
13 as of this date.)  
14 **Q. Mr. Han, Defendant's 65 is a trademark**  
15 **registration for RLI and design, for the company**  
16 **Top Care, Inc.**  
17 Are you familiar with that company at  
18 all?  
19 A. No.  
20 **Q. Have you ever seen this logo in the**  
21 **marketplace?**  
22 A. No.  
23 **Q. In your opinion, is this logo similar**  
24 **to the fleur-de-lis logo?**  
25 A. No.  
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1 **Han**  
2 **soil pipe fittings.**  
3 In your opinion, is this logo similar  
4 to your fleur-de-lis logo?  
5 A. No.  
6 **Q. Can you describe for me the**  
7 **differences between this logo and your**  
8 **fleur-de-lis logo.**  
9 MR. MALTBIE: Objection to form.  
10 A. This is totally different.  
11 **Q. Can you be more particular, more**  
12 **specific?**  
13 MR. MALTBIE: Objection to form.  
14 A. This logo looks to -- more like a  
15 Chinese, oh -- what's the -- currency, instead  
16 of a fleur-de-lis.  
17 **Q. Okay. Thank you.**  
18 A. Any more?  
19 MR. SCHROEDER: Let's do this. Let's  
20 take a short, two-minute break. I mean,  
21 this is -- do a once through, and then I  
22 think I'm about done.  
23 (Recess from 4:32 to 4:37.)  
24 BY MR. SCHROEDER:  
25 **Q. Just one final point. Mr. Maltbie**  
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1 **Han**  
2 **Q. Can you describe for me differences**  
3 **between this logo and your logo?**  
4 MR. MALTBIE: Objection to form.  
5 A. RLI --  
6 **Q. Any other differences?**  
7 A. This doesn't look similar at all.  
8 **Q. Okay. Thank you.**  
9 MR. SCHROEDER: Let's mark this  
10 document as Defendant's 66.  
11 (Trademark registration for a logo to  
12 Richmond Foundry, Inc., a Florida company,  
13 was marked Defendant's 66 for  
14 identification, as of this date.)  
15 **Q. Mr. Han, Defendant's 66 is a trademark**  
16 **registration for a logo to Richmond Foundry,**  
17 **Inc., a Florida company.**  
18 Are you familiar with that company at  
19 all?  
20 A. No.  
21 **Q. Have you ever seen that logo in the**  
22 **marketplace?**  
23 A. No.  
24 **Q. Okay. The goods identified in the**  
25 **application are plumbing equipment, namely meta**  
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1 **Han**  
2 **handed me a few documents during an earlier**  
3 **break, which are Bates-stamped 237 to 246.**  
4 **Mr. Han, are you familiar at all with**  
5 **these documents?**  
6 A. I looked over it this morning.  
7 **Q. Okay. Do you have any firsthand**  
8 **knowledge, or should I be asking Joe about these**  
9 **documents?**  
10 A. It would be asking him better than me.  
11 **Q. Were you involved in the preparation**  
12 **of the declaration of Alice Anderson?**  
13 A. No.  
14 **Q. Was Mr. Maltbie involved? Let me**  
15 **rephrase that.**  
16 **Was Joe involved in the preparation of**  
17 **the declaration of Alice Anderson?**  
18 A. I -- not sure. I think, yes, but....  
19 MR. SCHROEDER: Okay. I have nothing  
20 further. Thank you for coming in today and  
21 answering questions. And that concludes  
22 the deposition.  
23 (Continued on following page to  
24 include jurat.)  
25  
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